



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

CERTIFIED MAIL # 91 7108 2133 3932 1837 2001

January 19, 2017

**Re: Plastic Packaging Technologies, LLC
Notice of Violation (NOV)
Air Permit
Franklin County
0125041958**

Mr. James Schuman
Plastic Packaging Technologies
4041 Roberts Road
Columbus, OH 43228

Subject: Notice of Violation

Dear Mr. Schuman:

On October 25, 2016, Plastic Packaging Technologies, LLC performed emissions testing on the regenerative thermal oxidizer (RTO) associated with two flexographic presses (K009 and K012) and a mixing room (P001). The emissions test was performed to demonstrate compliance with the 95%, by weight, overall VOC control efficiency outlined in the terms and conditions of PTIO P0120000 for P001 and K009, and in the terms and conditions of PTIO P0119463 for K012. Plastic Packaging Technologies, LLC previously performed emissions testing on the same RTO and emissions units for the purpose of demonstrating compliance with the overall control efficiency on July 7, 2016. Ohio EPA issued an NOV dated August 11, 2016 to Plastic Packaging, LLC in response to the failure to demonstrate compliance with the applicable permits during the July 7, 2016 emissions test.

Findings

Based on a review of the emissions test results, Ohio EPA has determined that emissions units K009, K012, and P001 are not in compliance with the permitted 95%, by weight, overall VOC control efficiency. In order to bring your facility into compliance, we recommend promptly addressing these violations within the timeframes outlined in this letter.

1. Ohio Revised Code (ORC) 3704.05(C):

"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

The terms and conditions of PTIO P0120000 for P001 and K009 and the terms and conditions of PTIO P0119463 for K012 establish an overall control efficiency of VOC of 95%, by weight.

(a) The emissions test report submitted on December 9, 2016, identified the measured overall control efficiency as follows:

Run #1 – 92.8%
Run #2 – 92.4%
Run #3 – 93.8%
Average – 93.0%

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An exceedance of the overall VOC control efficiency, as identified above, is considered a violation of the terms and conditions of PTIO P0120000, PTIO P0119463, and Ohio Revised Code (ORC) 3704.05(C).

(b) *Requested action:*

Within 30 days of receipt of this letter, Plastic Packaging Technologies, LLC shall submit a compliance plan to Ohio EPA which will address how the facility will address the control efficiency exceedance identified above.

Conclusion

The Ohio EPA requests that Plastic Packaging Technologies, LLC promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. Within 30 days of receipt of this letter, please provide, to Ohio EPA, the documentation requested above. If you have already resolved the violations listed above, thank you.

Failure to comply with Chapter 3704. of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, Plastic Packaging Technologies, LLC is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 3704.06 of the Ohio Revised Code.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact Allie Fair by phone at (614) 728-3802 or by e-mail at alexandria.fair @epa.ohio.gov.

Sincerely,



Kelly Saavedra
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: Kelly Toth, Manager, DAPC/CDO

ec: John Paulian, DAPC/CO
James Kavalec, DAPC/CO
Kelly Saavedra, Supervisor, DAPC/CDO
Alexandria Fair, DAPC/CDO

KS/ct 0125041958 NOV slack test Oct 25 2016

/bc: Brian Dickens, USEPA, Region V